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*Counsel for Objectors Rockhurst University,
Harry Garavanian, and Gary Talewsky*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 3:07-cv-5944-JST
MDL No. 1917

CLASS ACTION

This Document Relates to:

All Indirect Purchaser Actions

DECLARATION OF THERESA D. MOORE IN SUPPORT OF OBJECTIONS TO D.E. 4351 REPORT AND RECOMMENDATION OF SPECIAL MASTER RE MOTIONS (1) TO APPROVE INDIRECT PURCHASER PLAINTIFFS' SETTLEMENTS WITH THE PHILLIPS, PANASONIC, HITACHI, TOSHIBA, SAMSUNG SDI, TECHNICOLOR AND TECHNOLOGIES DISPLAYS AMERICAS DEFENDANTS, AND (2) FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS TO CLASS REPRESENTATIVES BY OBJECTOR ROCKHURST UNIVERSITY, OBJECTOR GARY TALEWSKY, AND OBJECTOR HARRY GARAVANIAN

Judge: Honorable John S. Tigar
Courtroom 9-19th Floor
Special Master: Martin Quinn, JAMS

1 I, Theresa D. Moore, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California. I am Counsel
3 for Objectors Rockhurst University, Gary Talewksy, and Harry Garavanian. I make this
4 declaration based on my personal knowledge and my best recollection, and, if called to testify
5 as a witness in this matter, I could and would competently testify to the facts contained herein

6 2. I make this declaration in support of Objections To Docket Entry 4351 Report
7 And Recommendation Of Special Master Re Motions (1) To Approve Indirect Purchaser
8 Plaintiffs' Settlements With The Phillips, Panasonic, Hitachi, Toshiba, Samsung Sdi,
9 Technicolor And Technologies Displays Americas Defendants, And (2) For Award Of
10 Attorneys' Fees, Reimbursement Of Litigation Expenses, And Incentive Awards To Class
11 Representatives By Objector Rockhurst University, Objector Gary Talewsky, And Objector
12 Harry Garavanian

13 3. Attached hereto as **Exhibit A** is a true and correct copy of the Docket Number
14 768 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
15 MDL 1917 that I downloaded from the ECF court filing website prior to October 8, 2015.

16 4. Attached hereto as **Exhibit B** is a true and correct copy of the Docket Number
17 796 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
18 MDL 1917 that I downloaded from the ECF court filing website prior to October 8, 2015. It
19 contains only Judge Conti's filing initials, and was under the heading for Docket Entry 796,
20 "Stipulation and Proposed Order". It contains both the signatures of Special Master Legge and
21 Judge Conti.

22 5. Attached hereto as **Exhibit C** is a true and correct copy of the Docket Number
23 796 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944,
24 MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains
25 only Judge Tiger's filing initials, has no Judge's signature, and differs from the document that
26 was in its place and that I downloaded prior to October 8, 2015.

6. Attached hereto as **Exhibit D** is a true and correct copy of the Docket Number 797 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944, MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains the filing initials of Judge Conti and Judge Tiger, and also the Docket Number 796 and differs from the document that was there prior to October 8, 2015.

7. Attached hereto as **Exhibit E** is a true and correct copy of the Docket Number 799 of this case, In Re Cathode Ray Tube (CRT) Antitrust Litigation Case No. 3:07-cv-5944, MDL 1917 that I downloaded from the ECF court filing website in February 2016. It contains Judge Conti's initials and Judge Tiger's initials. It contains both the signatures of Special Master Legge and Judge Conti and is different than the document that was in its place prior to October 8, 2015. It also contains a document number of 796.

8. Attached hereto as **Exhibit F** is a true and correct copy of a screen shot of the home page of the Chunghwa Picture Tube (CPT) CRT Settlement Notice website as it existed on 11.1.11 and was downloaded by me on 02.09.16 from the Internet Archive website <http://archive.org/web/>

9. Attached hereto as **Exhibit G** is a true and correct copy of a screen shot of the home page of the LG Picture Tube CRT Settlement Notice website as it existed on 10.16.14 and was by me downloaded on 02.12.16 from the Internet Archive website <http://archive.org/web/>

10. I am informed and believe that The Internet Archive referred to in above ¶8 and ¶9 is an organization which documents and saves for historic purposes websites as they existed on a particular dates in the past. The [Internet Archive](http://archive.org/), a 501(c)(3) non-profit, building a digital library of Internet sites and other cultural artifacts in digital form.

11. I acted as a co-lead counsel in In Re TFT-LCD (Flat-Panel) Antitrust Litigation USDC NDCA 3:07-md-01827, which involved a price fixing conspiracy of flat panel glass for computers and television, and to which CRT was the precursor conspiracy. I have been closely involved in all aspects of the TFT-LCD litigation including the administration and distribution of the \$1.1 Billion settlement. A review of distribution records in that matter and consultation

1 with the court appointed settlement administrator and with the three largest claims aggregators
2 reflect that the distribution to the Indirect Purchase Repealer States of Massachusetts and
3 Missouri was over \$41 million, and was \$340 thousand to the State of Maine.

4 12. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt of
5 transcript from the hearing with the Special Master on January 5, 2016.

6 13. Attached hereto as **Exhibit I** is a true and correct copy of this Objectors
7 Objection and Declaration filed on October 8, 2015.

8 14. Attached hereto as **Exhibit J** is a true and correct copy of this Objectors Reply
9 Objection and Declaration filed on December 9, 2015 on JAMS CaseAnywhere filing system.

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11 I declare under penalty of perjury that the foregoing is true and correct. Executed this
12 12th day of February, 2016.

13 /s/ Theresa D. Moore
14 Theresa D. Moore
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